

PETER C. WOLFF, JR. #2332
Federal Public Defender
District of Hawaii
300 Ala Moana Boulevard, Suite 7104
Honolulu, Hawaii 96850
Telephone: (808) 541-2521
Facsimile: (808) 541-3545
E-Mail: peter_wolff@fd.org

Attorney for Defendant
GRANT MANAKU

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	Cr. No. 18-00069 LEK
)	
Plaintiff,)	Motion for Release on Bail
)	
v.)	Declaration of Counsel
)	
GRANT MANAKU,)	Certificate of Service
)	
Defendant.)	
_____)	

Motion for Release on Bail

COMES NOW the defendant, GRANT MANAKU, by and through his undersigned counsel, Peter C. Wolff, Jr., Federal Public Defender, and moves this Honorable Court to release him pending sentencing and, as well, to permit him to make a voluntary surrender to his designated institution following the imposition of sentence (assuming that he fully complies with his conditions of release if the instant

motion is granted). This motion is based on the files and records of this case and the Declaration of Counsel attached hereto.

Mr. Manaku was convicted of the offense alleged in the indictment, namely that he “did knowingly possess material that contained images of child pornography” in “violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2)” following a jury trial. At the conclusion of the trial, the government sought and the court ordered that he be detained.

The legal standard for release under the circumstances is found in 18 U.S.C. § 3145 which provides in pertinent part that “[a] person subject to detention pursuant to section 3143(a)(2) or (b)(2), and who meets the conditions of release set forth in section 3143(a)(1) or (b)(1), may be ordered released, under appropriate conditions, by the judicial officer, if it is clearly shown that there are exceptional reasons why such person’s detention would not be appropriate.”

Here, the defendant has a very good history while released on supervision by Pretrial Services for a period of over one year. A couple of weeks before trial, he was admonished for one violation (positive test for marijuana which he denied using), but has otherwise been fully compliant. Mr. Manaku has been gainfully employed, living in a suitable rented room,

and otherwise a contributing member of society. Under these circumstances it is submitte4d that the instant motion should be granted.

DATED: Honolulu, Hawaii, September 9, 2019.

/s/ Peter C. Wolff, Jr.
PETER C. WOLFF, JR.
Attorney for Defendant
GRANT MANAKU

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